1 2 3 4 5 6	Richard M. Heimann (State Bar No. 63607) Kelly M. Dermody (State Bar No. 171716) Eric B. Fastiff (State Bar No. 182260) Brendan P. Glackin (State Bar No. 199643) Dean M. Harvey (State Bar No. 250298) Anne B. Shaver (State Bar No. 255928) LIEFF CABRASER HEIMANN & BERNSTEIN, LLP 275 Battery Street, 29th Floor San Francisco, California 94111-3339 Telephone: 415.956.1000 Facsimile: 415.956.1008		
7 8 9 10	Joseph R. Saveri (State Bar No. 130064) SAVERI LAW FIRM 255 California, Suite 450 San Francisco, California 94111 Telephone: 415.500.6800 Facsimile: 415.500.6803 Interim Co-Lead Counsel for Plaintiff Class		
12	IN THE UNITED STATES DISTRICT COURT		
13 14	FOR THE NORTHERN DISTRICT OF CALIFORNIA SAN JOSE DIVISION		
15 16 17 18	IN RE: HIGH-TECH EMPLOYEE ANTITRUST LITIGATION THIS DOCUMENT RELATES TO: ALL ACTIONS	Master Docket No. 11-CV-2509-LHK PLAINTIFFS' NOTICE OF COMPLIANCE WITH THE COURT'S JUNE 5, 2012 CASE MANAGEMENT ORDER	
20			
21	PLEASE TAKE NOTICE that the Named Plaintiffs have complied with the Court's June 5,		
22	2012 Case Management Order. (Dkt. No. 148.)		
23	As set forth in the attached Declaration of Dean M. Harvey Regarding Plaintiffs'		
24	Compliance with the Court's June 5, 2012 Case Management Order ("Harvey Decl.") and the		
25	attached Declaration of Joseph R. Saveri Regarding Compliance with the Court's June 5, 2012		
26	Case Management Order ("Saveri Decl."), Plaintiffs have complied with their discovery		
27	obligations. Harvey Decl., ¶¶ 2-13; Saveri Decl., ¶¶ 2-3.		
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1	On June 6, 2012, Plaintiffs produced resumes for all Named Plaintiffs. Harvey Decl., ¶		
2	10. Between June 5 and June 7, 2012, Plaintiffs served their Supplemental Interrogatory		
3	Responses regarding the three Named Plaintiffs that remained outstanding. <i>Id.</i> , ¶ 8. On June 8,		
4	2012, Plaintiffs produced 2,381 documents, both from paper originals and from electronically		
5	stored information ("ESI"), regarding the Named Plaintiffs' employment and compensation		
6	history, including emails, correspondence, and other records. <i>Id.</i> , ¶ 11. On June 15, 2012,		
7	Plaintiffs produced 5,948 documents, and completed their production of documents regarding the		
8	Named Plaintiffs' employment and compensation history. <i>Id.</i> , ¶ 12. In total, Plaintiffs have		
9	produced 25,156 pages in response to Defendants' document requests. 1 Id., ¶ 13.		
10	Based on their investigation, Plaintiffs believe that they have identified, gathered and		
11	produced all responsive, non-privileged documents. Harvey Decl., ¶ 13; Saveri Decl., ¶ 3.		
12			
13		LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP	
14			
15	Dated: June 18, 2012	By: <u>/s/ Kelly M. Dermody</u> Kelly M. Dermody	
16		Richard M. Heimann (State Bar No. 63607)	
17		Kelly M. Dermody (State Bar No. 171716) Eric B. Fastiff (State Bar No. 182260)	
18		Brendan Glackin (State Bar No. 199643) Dean Harvey (State Bar No. 250298)	
19		Anne B. Shaver (State Bar No. 255928) LIEFF CABRASER HEIMANN & BERNSTEIN, LLP	
20		275 Battery Street, 29th Floor San Francisco, California 94111-3339	
21		Telephone: 415.956.1000 Facsimile: 415.956.1008	
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27	1 Durayout to the someone of a	the mention the decorporate have been anothered in electronic forms	
28	The total size of Plaintiffs' pro-	the parties, the documents have been produced in electronic form.	

The total size of Plaintiffs' production to date exceeds 4.8 gigabytes. Harvey Decl., \P /. PLAINTIFFS' NOTICE OF COMPLIANCE WITH

- 2 -

1	Dated: June 18, 201	SAVERI LAW FIRM	
2			
3		By: /s/ Joseph R. Saveri Joseph R. Saveri	
4		Joseph R. Saveri (State Bar No. 130064) SAVERI LAW FIRM	
5		SAVERI LAW FIRM 255 California, Suite 450	
6		255 California, Suite 450 San Francisco, California 94111 Telephone: 415.500.6800 Facsimile: 415.500.6803	
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8		Interim Co- Lead Counsel for Plaintiff Class	
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PLAINTIFFS' NOTICE OF COMPLIANCE WITH THE COURT'S JUNE 5, 2012 CMO Master Docket No. 11-CV-2509-LHK